

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Dominique Paige, a Special Agent with the Drug Enforcement Administration (DEA), being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent (SA) of the DEA and as such, I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States who is empowered to conduct criminal investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section, 2516.
2. I have conducted and assisted in investigations into the unlawful possession, possession with the intent to distribute, distribution of controlled substances, importation of controlled substances, and the associated conspiracies in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), 846, 952, and 963. I have received detailed instructions and conducted various complex investigations concerning the unlawful importation and distribution of controlled substances, the laundering and concealment of drug proceeds, the illegal use of communication facilities by drug traffickers in furtherance of their criminal activities and conspiracies to engage in these activities. I have experience conducting surveillance operations, analyzing telephone records, interviewing witnesses, executing search and arrest warrants, participating in wire and electronic physical surveillance and other investigative techniques. The investigations in which I have participated have resulted in the arrest, prosecution and conviction of individuals who have smuggled, received and distributed controlled substances, including marijuana and cocaine as well as the seizure of those illegal drugs and proceeds of the sale of those illegal drugs.

3. Because of my personal participation in this investigation, and because of information provided to me by other agents and officers, and my personal observations, I am familiar with the facts and circumstances of this investigation. My experience in investigating drug offenders, my education, my conversations with senior drug agents and chemists, and my specialized training formed a basis of the opinions and conclusions set forth below which I drew from the facts set forth herein.
4. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation; on information conveyed to me by other law enforcement officials; and on my review of records, documents, and other physical evidence obtained during this investigation. This affidavit is not intended to include every fact observed by me or known by the government.
5. Based on my training and experience, my knowledge of this case and my discussions with other law enforcement officers, I am familiar with narcotic traffickers' and money launderers' methods, schemes, and operations, and know:

FACTS IN SUPPORT OF PROBABLE CAUSE

6. During the month of September 2024, Rafael RODRIGUEZ-Martinez (hereinafter "RODRIGUEZ-Martinez") contacted a DEA agent, acting in an undercover capacity (UC), to coordinate a drug smuggling venture from the Dominican Republic (DR) to Puerto Rico (PR). RODRIGUEZ-Martinez and the DEA UC discussed coordinates, date and time and drug load amount for said venture.
7. On September 7, 2024, RODRIGUEZ-Martinez, coconspirator Heriberto MOTA-Cedeno (hereinafter "MOTA-Cedeno") and the DEA UC agreed to conduct a maritime narcotics venture of approximately 150 kilograms of cocaine near coordinates 18 26.000N, -67

53.000W. The aforementioned coordinates are located approximately nineteen (19) nautical miles north of Mona Island, PR. In addition, MOTA-Cedeno told the DEA UC that he (MOTA-Cedeno) and RODRIGUEZ-Martinez will be receiving the drug load once it reaches PR safely.


8. On September 8, 2024, DEA agents, acting in an undercover capacity (UC), navigated a DEA vessel towards the above-mentioned coordinates to rendezvous with an unknown vessel (hereinafter referred to as VESSEL-1) and receive approximately 150 kilograms of cocaine. On the same date, VESSEL-1 transferred five burlap sack bales and one duffel-style bag to the UC personnel aboard the UC vessel. The aforementioned burlap sack bales and duffel bag contained brick-shaped packages of a white powdery substance that field tested positive for cocaine and weighed approximately 172.4 kilograms. Subsequently, DEA UC agents transported said drug load to Puerto Rico (PR), processed it and secured it into DEA evidence as part of an ongoing investigation.
9. On September 9, 2024, RODRIGUEZ-Martinez agreed to meet the DEA UC to receive said drug load (172.4 kilograms). On the same date, DEA agents staged at a predetermined location to conduct a controlled delivery operation involving RODRIGUEZ-Martinez and any other co-conspirators involved. Subsequently, DEA UCs identified the vehicle driven by RODRIGUEZ-Martinez after UCs established communication with RODRIGUEZ-Martinez, who verbally confirmed he (RODRIGUEZ-Martinez) was arriving to the location in a red pick-up truck.
10. Upon arrival to the DEA UCs' location, RODRIGUEZ-Martinez and MOTA-Cedeno parked said red pick-up truck near the UC vehicle. DEA UCs proceeded to show RODRIGUEZ-Martinez and MOTA-Cedeno the bales located inside the UC vehicle for transfer to both men.

Shortly after, DEA agents, wearing clear and visible police markings, arrested RODRIGUEZ-Martinez and MOTA-Cedeno.

CONCLUSION

11. Based upon my training, experience, and the abovementioned facts, I have probable cause to believe that: Rafael RODRIGUEZ-Martinez and Heriberto MOTA-Cedeno, and others have committed the following violation of Federal Laws: Attempted Possession with Intent to Distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance and conspiracy to do the same, in violation of Title 21, United States Code. Section 841(a)(1) and 841(b)(1)(A)(ii) and 846.

I hereby declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.


Dominique Paige
Special Agent
Drug Enforcement Administration

Sworn in accordance with the requirements of Federal Rule of Criminal Procedure 4.1 by telephone at 3:17 P.M. on September 10, 2024.

  Digitally signed by Hon.
Giselle López-Soler
HONORABLE GISELLE LOPEZ-SOLER
UNITED STATES DISTRICT JUDGE